

# EXHIBIT H

On Wed, Feb 13, 2013 at 3:00 PM, Paul Godfread <[paul@godfreadlaw.com](mailto:paul@godfreadlaw.com)> wrote:

Dear Mr. Steele,

I will not accept service and do not consent to jurisdiction in any state but Minnesota. Nor does my client, Alan Cooper. If you have your answer or counterclaims for the Cooper v. Steele et al. matter ready, feel free to email those in lieu of service. I will confirm receipt. I remind you that your response is due tomorrow.

But as to the other supposed lawsuits that you alluded to on the phone, I don't have any idea what you are talking about, because you wouldn't tell me the basis of your claims. If the claims are based upon my client bringing suit against you, those suits would almost certainly be frivolous. Please don't play games, Mr. Steele. If you think that you or your clients have sincere causes of action, you could at least tell me what they are in general terms.

Sincerely,

Paul Godfread

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On Feb 14, 2013, at 8:08 AM, John Steele <[johnlsteele@gmail.com](mailto:johnlsteele@gmail.com)> wrote:

Mr. Godfread,

Since you will not waive service, you will be finding out what the causes of action are when you are served with the various complaints. I am not your attorney and do not have an obligation to explain to you the various lawsuits you are now involved in. In fact, I have no involvement with several of them. Perhaps retaining an attorney would be an appropriate option for you.

On a separate note, I just became aware that you appear to have violated Rule 45 of the Minnesota Rules of Civil Procedure in that you issued multiple subpoenas to third parties in the Guava v. Merkel case without notice to the parties in that case. I have affidavits supporting this allegation, and have personally spoken to one of the people you inappropriately sent a subpoena to.

What is truly amazing is that you don't even represent a party in the matter, yet are issuing subpoenas without notice to the ACTUAL parties in the case and without leave of the court. You have absolutely no authority to issue such documents. When you were recently notified to stop such behavior, you ignored that request. Clearly as an officer of the court, I am obligated to make the Minnesota Lawyers Professional Responsibility Board aware of your flagrant violation of Rules 45.01(e) and 45.02. I would strongly suggest you stop abusing the subpoena process moving forward. No need to make matters worse.

Govern yourself accordingly,

John Steele

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**From:** John Steele <[johnlsteele@gmail.com](mailto:johnlsteele@gmail.com)>  
**Subject:** Meet and Confer on first round of Subpoenas and other issues  
**Date:** February 15, 2013 9:33:43 PM CST  
**To:** Paul Godfread <[paul@godfreadlaw.com](mailto:paul@godfreadlaw.com)>

Mr. Godfread,

This email is an attempt to reach you in an attempt to meet and confer about several subpoena requests that Prenda Law is intending to present early next week in St. Clair County regarding the first lawsuit you were recently served with. I also called you and left a message. If we do not hear from you by Monday, we will proceed and inform the court you were unreachable. In an effort to accommodate your schedule, I am more than willing to schedule the hearing on the matter on a date next week that is mutually convenient. Please note that courts in St. Clair normally prohibit telephonic appearances.

It is my understanding that several other people have either recently sued you, or are in the process of serving you. As I explained to you earlier this week, my personal suit against you should be filed in Florida early next week. Despite the intensity of the litigation that is starting, I want to assure you that out of professional courtesy I will do everything I can to accommodate the various court hearings you will be involved in.

Lastly, I need to know if you will be representing Mr. Cooper in the St. Clair case in which you are also a defendant. You stated on the phone Wednesday of this week that you would represent him in that particular case. I wanted to confirm this since you are also a named and served defendant in the case, and it would appear you may have a conflict in representing a co-defendant.

I await your responses.

John Steele

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**From:** Paul Hansmeier <[prhansmeier@thefirm.mn](mailto:prhansmeier@thefirm.mn)>  
**Subject:** NOTICE OF IMPENDING LITIGATION: LITIGATION HOLD REQUIRED  
**Date:** February 21, 2013 4:28:50 PM CST  
**To:** [paul@godfreadlaw.com](mailto:paul@godfreadlaw.com)

Dear Mr. Godfread:

My firm has been retained by Livewire Holdings LLC to pursue claims in the U.S. District Court for the District of Minnesota against you and your co-conspirators arising from defamation, civil conspiracy and related acts. The alleged acts occurred in e-mail communications and blog posts describing my client as a criminal enterprise. As you know, such statements constitute defamation *per se* and are, quite frankly, wildly inappropriate. Less-egregious claims have resulted in multi-million dollar judgments, as I trust this one will. The facts of the underlying case are essentially a law school exam hypothetical of every possible variation of libel. Perhaps you can forward my client's complaint to your former professors at William Mitchell. My client is well-aware that you are a major contributor to these blog sites.

The purpose of this e-mail is to inform you of impending litigation so that you preserve all relevant evidence in your possession including, but not limited to, communications between yourself and David Camaratto, Morgan Pietz, Nicholas Ranallo and any other individuals associated directly or

indirectly with the sites fightcopyrighttrolls and dietrolldie. Further, any and all other evidence that might be relevant to this matter must, of course, be preserved.

I suspect that you aligned yourself with these defamatory efforts as a marketing strategy. I don't know if these efforts paid off, but I can assure you that making baseless accusations of criminal conduct is not a wise move for a licensed attorney. All of that being said, my client knows that you didn't work alone in these wrongful efforts. If you think we are missing out on more serious actors in your enterprise my client would be willing to consider decreasing your liability in exchange for information about these individuals. Of course, that interest will disappear if someone else comes forward first. Think it over and let me know. If you're willing to take the fall for whole group then you are decidedly a "true believer."

Welcome to the big leagues.

Paul

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**From:** John Steele <[johnlsteele@gmail.com](mailto:johnlsteele@gmail.com)>  
**Date:** February 22, 2013, 6:39:15 PM CST  
**To:** Paul Godfread <[paul@godfreadlaw.com](mailto:paul@godfreadlaw.com)>  
**Subject: Representing Mr. Cooper**

This email is to confirm our phone conversation last week in which you said you are not representing Mr. Cooper for any lawsuits outside of Minnesota. As you know, Mr. Cooper has been served in two separate Illinois suits with additional suits currently being filed. The various attorneys will need to reach out to Mr. Cooper to get started with the extensive discovery necessary in those cases.

I assure you that I will not address the Minnesota case you do represent Mr. Cooper on.

I will reach out to you next week to discuss some preliminary matters regarding the St. Clair case.

John Steele

PS To reduce the risk of confusion, I typically refer to a case by the place it was filed in. As more cases get filed over the next week and our schedules get crowded, I think its important to keep them all straight.